

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2020-63-E

In the Matter of:

Petition of Bridgestone Americas
Tire Organization, LLC for an
Order Compelling Dominion
Energy South Carolina,
Incorporated to Allow the
Operation of a 1980 kW AC Solar
Array as Authorized by State Law

PETITION TO INTERVENE

The South Carolina Coastal Conservation League (“CCL”) respectfully petitions the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s Rules of Practice and Procedure. In support of its petition, Petitioner states as following:

1. The Commission established Docket 2020-63-E on February 18, 2020, by way of Bridgestone Americas Tire Organization’s (“BATO”) Petition filed on February 14, 2020. In October of 2018, BATO completed construction of a 1980 kW Solar Array at its plant in Graniteville, South Carolina. However, Dominion Energy South Carolina (“DESC”) has blocked BATO from energizing the Solar Array, claiming that it must first undergo utility review under the South Carolina Generator Interconnection Procedures (“SC GIP” or “interconnection procedures”). BATO disputes that the Solar Array is subject to the SC GIP because BATO will consume all of the electricity produced by the Solar Array rather than net meter or sell any output to DESC or any third party.

2. This Petition to Intervene is timely filed, as the Commission has not yet established an intervention deadline for this proceeding.

3. CCL is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who receive electricity service from DESC.

4. CCL and its members have direct and material interests that will be impacted by the decisions made in this proceeding regarding the applicability of the SC GIP to certain distributed energy resources.

5. As an intervenor in Docket No. 2015-362-E, CCL helped to develop the SC GIP that DESC seeks to enforce with respect to the Solar Array, and thus has a substantial interest in seeing the interconnection procedures fairly and appropriately implemented by DESC. This proceeding will resolve whether the SC GIP applies to the Solar Array and, more broadly, to self-consuming generating facilities. The precedential effect created by the Commission's decision will have significant implications for distributed generation development in the State.

6. Through its intervention in this proceeding, CCL seeks to promote greater adoption of clean, distributed energy resources to meet South Carolina's energy needs and to increase access to these resources for all customers, including large non-residential customers. CCL seeks to ensure that the SC GIP is interpreted and implemented in a manner that promotes, rather than inhibits, these goals. If the Commission determines

that the SC GIP extends to the Solar Array, then other self-consuming generating facilities like it could be subject to similar costs and delays associated with interconnection review. This would result in a chilling, if not freezing, effect on such projects.

7. Without intervention, CCL and its members will be unable to adequately protect their substantial interest in the widespread, efficient adoption of distributed energy resources for the benefit of South Carolina residents and ratepayers. Further, CCL has an interest in the fair implementation of the SC GIP after it spent significant time and resources helping to craft the interconnection procedures in the prior proceeding.

8. Granting CCL's Petition to Intervene would be in the public interest and consistent with the Commission's policies encouraging maximum public participation in the issues before it.

9. If the Commission grants intervention, CCL intends to advance the position that the Solar Array is not subject to the SC GIP as adopted by the Commission in Docket No. 2015-362-E.

10. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, CCL is represented by counsel in this proceeding:

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WHEREFORE, CCL prays that it will be allowed to intervene as a party of record and to participate fully in this proceeding.

Respectfully submitted this 6th day of April, 2020.

s/ J. Blanding Holman IV

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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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April 6th, 2020

/s/ Emily E. Selden